

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

JOHN GIDDIENS,)	
on behalf of himself and all others)	
similarly situated)	
)	
Plaintiff,)	C.A. No. 12-cv-02624-LDD
v.)	
)	CLASS ACTION
FIRST ADVANTAGE LNS SCREENING)	
SOLUTIONS, INC, F/K/A LEXISNEXIS)	
SCREENING SOLUTIONS, INC.)	
)	
Defendant.)	
)	

**MOTION TO PERMIT FILING OF DOCUMENTS IN SUPPORT OF PLAINTIFF’S
MOTION FOR ATTORNEYS’ FEES AND EXPENSES UNDER SEAL**

Plaintiff John Giddiens, by counsel, respectfully requests that the Court enter the attached proposed Order permitting the filing under seal of certain documents relating to Plaintiff’s Motion For Attorneys’ Fees and Reimbursement of Expenses (“Motion”), and assigns the following reasons in support thereof.

1. In accordance with the Protective Order of this Court entered December 20, 2012 (Doc. 21), Plaintiff has marked as confidential the following documents: documents contained in Exhibit A attached to Appendix 1 to the Motion (Declaration of James A. Francis); documents contained in Exhibit SD-1 attached to Appendix 2 to the Motion (Declaration of Sharon M. Dietrich); documents contained in Exhibit BL-1 attached to Appendix 3 to the Motion (Declaration of Brendan Patrick Lynch).

2. The documents marked confidential contain attorney work product materials, and information protected by attorney-client privilege. No public interest is served by the disclosure

of this information other than to the Court and the parties of this litigation as necessary to resolve Plaintiff's Petition for Attorneys' Fees and Reimbursement of Expenses.

3. Pursuant to the Protective Order, at paragraph 14, and Local Rule 5.1.5(a)(2), documents in this case may be filed under seal only if the Court first enters an Order allowing the filing under seal.

WHEREFORE, Plaintiff John Giddiens respectfully requests that this Honorable Court grant this Motion and enter an Order in the form proposed herewith, permitting Plaintiff to file under seal documents designated as "Confidential."

Dated: November 21, 2014

Respectfully submitted,

FRANCIS & MAILMAN, P.C.

By: /s/ James A. Francis
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Attorneys for Plaintiff and the Class

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Plaintiff,)	C.A. No. 12-cv-02624-LDD
v.)	
)	CLASS ACTION
FIRST ADVANTAGE LNS SCREENING)	
SOLUTIONS, INC, F/K/A LEXISNEXIS)	
RISK SOLUTIONS, INC.)	
)	
Defendant.)	
)	

[PROPOSED] ORDER ALLOWING FILING UNDER SEAL

This matter is before the Court on the Plaintiff's Motion to Permit Filing Under Seal of certain documents designated as "Confidential" relating to Plaintiff's Motion for Attorneys' Fees and Reimbursement of Expenses contained in Exhibit A attached to Appendix 1 to the Motion (Declaration of James A. Francis); documents contained in Exhibit SD-1 attached to Appendix 2 to the Motion (Declaration of Sharon M. Dietrich); documents contained in Exhibit BL-1 attached to Appendix 3 to the Motion (Declaration of Brendan Patrick Lynch). Upon consideration of this matter, the Court hereby ORDERS that the Motion is GRANTED.

IT IS SO ORDERED, this _____ day of _____, 2014.

BY THE COURT:

Date:

LEGROME D. DAVIS, U.S.D.C.

CERTIFICATE OF SERVICE

I, **JAMES A. FRANCIS**, do hereby certify that, on this date, I caused a true and correct copy of the foregoing to be served via the Court's ECF Notification system upon all counsel of record.

/s/ James A. Francis
JAMES A. FRANCIS

Dated: November 21, 2014